

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MATCH GROUP, LLC,

Plaintiff,

v.

BEAZLEY UNDERWRITING LIMITED,

Defendant.

Case No.: 1:22-cv-4629-LGS-SLC

**DECLARATION OF JONATHAN S. ZELIG
IN SUPPORT OF BEAZLEY UNDERWRITING, LTD.'S
OPPOSITION TO MATCH GROUP, LLC'S MOTION FOR ATTORNEYS' FEES**

I, Jonathan S. Zelig, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.

2. The facts and evidence set out in this Declaration are based on my personal knowledge, gained through my work on this matter and otherwise, and are true and correct.

3. I submit this Declaration in support of defendant Beazley Underwriting, Ltd.'s ("Beazley") Opposition to plaintiff Match Group, LLC's Motion for Attorneys' Fees.

4. Attached as Exhibit 1 to my declaration is a true and correct copy of an email chain produced by Beazley in this action that is Bates stamped BEAZLEY0000786-787. The email chain contains, in pertinent part, a March 4, 2015 email sent by Leslie A. Platt, of Wiley Rein LLP ("Wiley"), to James Root, of InterActiveCorp ("IAC"), to acknowledge notice of the "*Highline* matter," as kept in Beazley's files in the ordinary course of business.

5. Attached as Exhibit 2 to my declaration is a true and correct copy of an email chain produced by Beazley in this action that is Bates stamped BEAZLEY0000845. The email chain

contains, in pertinent part, a March 12, 2015 email sent by Leslie A. Platt, of Wiley, to James Root, of IAC, to acknowledge notice of the “Warner v. Tinder matter,” as kept in Beazley’s files in the ordinary course of business.

6. Attached as Exhibit 3 to my declaration is a true and correct copy of an email chain produced by Beazley in this action that is Bates stamped BEAZLEY0000887. The email chain contains, in pertinent part, a May 4, 2015 email sent by Parker J. Lavin, of Wiley, to James Root, of IAC, to acknowledge notice of the “*Graf, et al. v. Match.com* matter,” as kept in Beazley’s files in the ordinary course of business.

7. Attached as Exhibit 4 to my declaration is a true and correct copy of an email chain produced by Beazley in this action that is Bates stamped BEAZLEY0001398. The email chain contains, in pertinent part, a July 30, 2015 email sent by Parker J. Lavin, of Wiley, to James Root and Ben Gildin, of IAC, to acknowledge notice of the “Greenberg Smoked Turkeys” matter, as kept in Beazley’s files in the ordinary course of business.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 19th day of July, 2023.

/s/ Jonathan S. Zelig
Jonathan S. Zelig

CERTIFICATE OF SERVICE

I hereby certify that, on July 19, 2023, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jonathan S. Zelig
Jonathan S. Zelig